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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,) Case No. CR-18-00258-EJD
Plaintiff,)
v.) **DECLARATION OF AMY MASON
SAHARIA IN SUPPORT OF MS.
HOLMES' MOTION FOR ACCESS TO
GRAND JURY SELECTION
MATERIALS**
ELIZABETH HOLMES and) Hon. Edward J. Davila
RAMESH "SUNNY" BALWANI,)
Defendants.)
)

DECLARATION OF AMY MASON SAHARIA IN SUPPORT OF MS. HOLMES'
MOTION FOR ACCESS TO GRAND JURY SELECTION MATERIALS
CR-18-00256-EJD

1 **DECLARATION OF AMY MASON SAHARIA**

2 I, Amy Mason Saharia, declare as follows:

3 1. I am an attorney admitted to practice in the District of Columbia and a partner at
4 the law firm of Williams & Connolly LLP. I represent Defendant Elizabeth Holmes and have
5 been admitted to practice *pro hac vice* in the above-captioned matter. I submit this declaration in
6 support of Ms. Holmes' Motion for Access to Grand Jury Selection Materials.

7 2. All the factual assertions contained in this declaration are true and correct to the
8 best of my knowledge. Unless otherwise noted, I make this declaration based on my own
9 personal knowledge, and if called as a witness, I could and would testify competently to the
10 contents hereof.

11 3. On behalf of Ms. Holmes, we are preparing a contemplated motion challenging the
12 jury-selection procedures for the grand jurors that returned the Second and Third Superseding
13 Indictments in this case. Although we have legitimate reasons to be concerned about the
14 representativeness of the grand jurors, we cannot ascertain whether we have substantial grounds
15 to file such a motion without access to the grand-jury materials.

16 4. The specific data Ms. Holmes seeks is set forth in Exhibit A to this declaration.

17 I declare under penalty of perjury of the laws of the United States that, except for those
18 matters stated on information and belief, the foregoing is true and correct. As to those matters
19 stated on information and belief, I declare under penalty of perjury of the laws of the United States
20 that I believe them to be true and correct.

21 Executed this 30 day of July, 2020 in Chevy Chase, MD.

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25 AMY MASON SAHARIA
26 Attorney for Elizabeth Holmes

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28 DECLARATION OF AMY MASON SAHARIA IN SUPPORT OF MS. HOLMES'
 MOTION FOR ACCESS TO GRAND JURY SELECTION MATERIALS
 CR-18-00256-EJD